Exhibit 16

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July 14, 2022

BY EMAIL

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**Re: *In re Tether and Bitfinex Crypto Asset Litig.*,
          No. 19 Civ. 9236 (KPF) (S.D.N.Y.)**

Dear Kyle:

We write on behalf of Defendants iFinex Inc., BFXNA Inc., BFXWW Inc., Tether
Holdings Limited, Tether Limited, DigFinex Inc., Tether Operations Limited, Tether
International Limited, Ludovicus Jan van der Velde and Giancarlo Devasini (the
"B/T Defendants") in response to your July 7, 2022 letter and to follow up on our
July 8, 2022 discussion regarding search terms.

I.   Plaintiffs' Proposed Search Terms

We appreciate that, in Plaintiffs' July 1, 2022 email, you identified the specific
RFP(s) to which each of your proposed search terms is purportedly tied. As we

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discussed on July 8 and in prior telephone calls, the B/T Defendants do not agree with Plaintiffs' approach to search terms.

The sole purpose of search terms is to identify documents that will be reviewed in order to produce documents in response to specific RFPs. Contrary to Plaintiffs' suggestions, search terms do not represent an alternative to serving RFPs and negotiating the scope of production in response. Accordingly, the B/T Defendants do not agree to use search terms that (*i*) have no significant connection to the identified RFP, (*ii*) are purportedly tied to RFPs in response to which the B/T Defendants objected and did not agree to produce documents or (*iii*) are purportedly tied to RFPs that do not require the use of search terms, such as requests for which the B/T Defendants agreed to produce "documents sufficient to show."

Merely as a few examples:

- Plaintiffs rely heavily on RFP 63, pursuant to which the parties agreed that the B/T Defendants will produce non-privileged documents, to the extent such documents exist and can be located after a reasonable search, that relate to any business strategy, plan, or directive of the B/T Defendants relating to the timing of issuance or transfer of USDT to any U.S. Exchange Defendant for the purchase of cryptocommodities.   But a number of the search terms that Plaintiffs claim are tied to RFP 63 have no discernable connection to that request – *e.g.*, "private address*"; "Ethereum* AND USDT"; "Crash* w/10 (Tether* OR USDT)"; "Declin* w/10 (Tether* OR USDT)"; "Drop* w/10 (Tether* OR USDT)"; "Suspicious* w/10 (Tether* OR USDT)".[1]

- "Call w/3 (me OR you)" is a common expression unconnected to the identified RFPs. The same is true of other proposed terms such as: "'end of month' or EOM"; "EURT"; "Transfer* w/10 (USDT OR Tether OR token)". Plaintiffs' unsupported speculation that an individual involved in misconduct might say "call me" in order to avoid a written record of communications is insufficient to justify the use of such a search term.

- Plaintiffs also tie numerous search terms to RFPs for which the B/T Defendants agreed to produce "documents sufficient to show," including but not limited to RFPs 4-7, 12-15, 21, 66-68, 77. Responding to such RFPs does not require the use of search terms. Similarly, we do not intend to use search terms in responding to RFPs 8-10.

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[1]   These terms – like many of Plaintiffs' proposed search terms – are also problematic for the obvious reason that "Tether" appears in the name of Tether Holdings Limited, Tether Limited, Tether Operations Limited and Tether International Limited.

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- Plaintiffs tie numerous search terms to RFPs for which no agreement to produce documents has been reached, including but not limited to RFPs 1, 22-25, 31, 36, 43-44, 46, 51-52, 69-71. With respect to RFP 31, the purported basis for more than sixty search terms, Defendants objected to, among other things, the enormous scope of the request for "[a]ll Documents relating to Your funds or Reserves at any bank or any other financial institution." Plaintiffs have refused to limit the scope of RFP 31 in any way, and the B/T Defendants have agreed, in connection with other RFPs, to provide documents sufficient to establish USDT reserves.

Attached to this letter is a line-by-line response to Plaintiffs' proposed search terms. In order to move this process forward, we have endeavored to be as flexible as possible and have accepted numerous search terms that are deeply problematic. To be clear, agreement to any search terms at this stage is purely for the purpose of providing an initial hit report. It is not an agreement to use any search terms for purposes of document review or production, and we continue to believe that many of Plaintiffs' proposed search terms are extremely broad and/or have only an attenuated (at best) connection to the identified RFP(s).

If you have any questions about particular search terms, please let us know.

II.   Time Period

Plaintiffs' "best and final offer" set forth in your July 7 letter is not significantly different from Plaintiffs' prior position and remains unsupported and unacceptable. The B/T Defendants proposal is already very generous: the production documents created from February 17, 2015 through October 6, 2019, the date on which this action was commenced. That time period already extends well beyond the last allegation of wrongdoing in the CAC.

Plaintiffs' July 7 letter – like previous letters – fails to identify any facts alleged in the CAC indicating any continuing misconduct. Paragraph 76 of the CAC merely presents a chart purportedly illustrating the "close relationship between prices of bitcoin and bitcoin futures on the CME from December 2017 until February 2020." And paragraphs 372-74 allege only that Tether continues to issue USDT, that Tether stated that the growth of USDT was in response to an "opportunity for big institutions and funds to make money," and that Tether surpassed a market capitalization of $5 billion. Those allegations do not suggest any misconduct and do not justify continuing discovery beyond the filing of this lawsuit. Nor does the cited statement by the Court suggest any ongoing misconduct: "Cryptocommodities make up a distinct market – which has grown exponentially since its establishment – and had a total market capitalization of over $176 billion in June 2020." *In re Tether & Bitfinex Crypto Asset Litig.*, 2021 WL 4452181, at *6 (S.D.N.Y. Sept. 28, 2021) (citing CAC ¶ 64).

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III.   Custodians

In the spirit of compromise, and in an attempt to make progress in our discussions, we agreed to include Stuart Hoegner, the General Counsel of Bitfinex and Tether, as a custodian to the extent that he communicated with an external third party. And, as previously noted, we will also review other documents that include Mr. Hoegner through our review of documents collected from the fourteen other custodians. This is an eminently reasonable approach that avoids unnecessarily imposing on the B/T Defendants the substantial burden of reviewing and logging large numbers of privileged documents.

Your July 7 letter asks that we "identify the process by which you would determine which documents you would exclude from review." We have already done so: we will review Mr. Hoegner's documents that were communicated to an external third party as described in our May 17 and June 30 letters. We will also be reviewing communications to and from Mr. Hoegner to the extent they are included in the review of documents from the 14 other document custodians.

If your review of Mr. Hoegner's documents indicate that you are missing important, non-privileged documents, we can discuss further at that time.

IV.   Plaintiffs' Requests for Production

RFPs 8-10

Our June 30 letter memorialized the parties' agreement that the B/T Defendants will produce non-privileged communications, to the extent such documents exist and can be located after a reasonable search, with Crypto Capital, the U.S. Exchange Defendants, Phil Potter and/or Reginald Fowler on the same topics the parties agreed to for RFP 2. We explained that, with respect to Mr. Potter, this production would be for the period after he left Bitfinex/Tether. Mr. Potter's communications from the period while he was at Bitfinex/Tether are excluded for the same reason that the parties agreed to exclude Ludovicus Jan van der Velde and Giancarlo Devasini from RFPs 8-10: he is already an agreed custodian.

RFP 37

Plaintiffs' July 7 letter inquires whether the B/T Defendants will provide documents relating to all loans of USDT to any "Defendant, Specified Individual/Entity, and Anonymous Trader." The B/T Defendants have agreed to produce documents sufficient to show loans of USDT, including the amount of USDT loaned, the identity of the recipient of the loan, and the amount and type of collateral received in exchange for the loan, either (*i*) between Bitfinex and Tether or (*ii*) by the B/T Defendants to any U.S. Exchange Defendant or the Anonymous Trader.

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The B/T Defendants do not agree to provide documents relating to all loans of USDT (if any) to the Specified Individuals/Entities, which were defined in Plaintiffs' May 6 letter as the individuals and entities identified in RFPs 27, 36 and 38-51. Plaintiffs have not provided any basis for such a request.

RFP 41

Our June 30 letter accurately states that Plaintiffs had agreed not to pursue RFP 41, which seeks documents relating to Paycase Financial, while reserving all rights. Plaintiffs stated that position during the parties' March 31 telephone call, which we memorialized in our April 4 letter. In any event, the B/T Defendants do not agree to produce documents in response to this RFP.

RFPs 52 & 56

During our April 8 meet and confer, we stated that we would consider running search terms in connection with RFPs 52 and 56, but we did not commit to doing so. With respect to the Paradise Papers, Plaintiffs allege in the CAC that they revealed that Bitfinex and Tether have overlapping officers and directors. (CAC ¶ 156.) The identity of the officers and directors of Bitfinex and Tether is not in dispute and does not require or justify discovery of all documents relating to the Paradise Papers.

As to "Mt. Gox," Plaintiffs allege fraudulent trading activity by individual not involved in this lawsuit in 2013, which predates the time period relevant to this lawsuit. (CAC ¶ 84-88.) That Mr. Devasini is alleged to have once referenced Mt. Gox on a message board does not justify discovery of all documents relating to Mt. Gox.   Nonetheless, as a compromise, the B/T Defendants will agree to run "Mt. Gox," "Willybot" and "Willy Bot" as search terms for purposes of an initial hit report.

Best regards,

/s/ Elliot Greenfield

Search Term	Responsive RFPs (Plaintiffs)
audit w/10 Tether	RFP No. 11
Tether w/10 transparency	RFP No. 26
"conflict of interest" or "conflicts of interest"	RFP No. 34
(2016 w/15 hack* OR theft* OR unauthorize* OR transfer* OR stolen) and (reserve* OR redem* or redeem*)	RFP No. 35
"ABT & Trust"	RFP No. 31
260011499	RFP No. 31
"Bank of America" OR BofA	RFP No. 31
898100395306	RFP No. 31
"Bank of Colorado"	RFP No. 31
5701063413	RFP No. 31
"Bank of Montreal"	RFP No. 31
"Bank of New York Mellon" OR "BNY Mellon"	RFP No. 31
BnkToTheFuture OR "Bnk to the Future"	RFP No. 31
"Bank of Communications"	RFP No. 31
"Banco Portuges de Investimento"	RFP No. 31
"Bank of the Philippine Islands"	RFP No. 31
2-5486163.306.001	RFP No. 31
Spoldzielczy	RFP No. 31
Kaohsiung	RFP No. 31
230510006385 OR 230509006380	RFP No. 31
Bankinter	RFP No. 31
Caixa	RFP No. 31
0216076478170 OR 0216076477370 OR 0216076476570 OR 0786071416230 OR 0786071414070 OR 0216076111170 OR 0216075956230 OR 0216076490070	RFP No. 31
"Canadian Imperial Bank of Commerce" OR CIBC	RFP No. 31
"CC001006882 5108411" OR "CC001006882 0374016" OR "CC001099702 4464710" OR "CC001099702 4113411" OR "CC001099702 4097513" OR "CC001099702 4210719"	RFP No. 31
Cathay	RFP No. 31
33087700408	RFP No. 31
Citibank OR Citi	RFP No. 31

Search Term	Responsive RFPs (Plaintiffs)
207112962 OR 207129503 OR 207132333 OR 206618910 OR 207139809 OR 207139817 OR 207134933 OR 207132325 OR 207134958 OR 42024768923 OR 42001787749 OR 42024769061 OR 57457749 OR 9945530933 OR 207108689	RFP No. 31
Deltec	RFP No. 31
"Deutsche Bank"	RFP No. 31
DE78660700240057016801 OR DE51660700240057016802 OR 192057016802	RFP No. 31
"Enterprise Bank"	RFP No. 31
1127548 OR 1241367 OR 1127564 OR 1127177 OR 1127193 OR 1128700 OR 1128727 OR 1127599 OR 1235784 OR 1127652 OR 1127644	RFP No. 31
"First Commercial Bank"	RFP No. 31
20386001075	RFP No. 31
Hwatai	RFP No. 31
3.366E+12	RFP No. 31
"HSBC Bank" OR "HSBC Securities" OR Pershing	RFP No. 31
861668 OR 141000147	RFP No. 31
ING	RFP No. 31
"JP Morgan Chase" OR JPMC OR Chase	RFP No. 31
296219550 OR 779558365	RFP No. 31
KGI	RFP No. 31
18580071208	RFP No. 31
"Metropolitan Bank"	RFP No. 31
"Noble Bank"	RFP No. 31
"Pekao Bank"	RFP No. 31
"Sackville Bank and Trust"	RFP No. 31
Santander	RFP No. 31
00080753 OR 10379431 OR 10446319 OR 10446322	RFP No. 31
"Shanghai Pudong Development"	RFP No. 31
"Signature Bank"	RFP No. 31
"Stearns Bank"	RFP No. 31
"Sun Trust"	RFP No. 31
810455498 OR 209364251 OR 1000211769301	RFP No. 31
"Shin Kong"	RFP No. 31

Search Term	Responsive RFPs (Plaintiffs)
4.99128E+11	RFP No. 31
Taishin	RFP No. 31
68760022865	RFP No. 31
TCA Investment Bancorp & Trust Company	RFP No. 31
"TD Bank"	RFP No. 31
4350649188	RFP No. 31
"US Bank"	RFP No. 31
"Wells Fargo" OR WF	RFP No. 31
2514680467	RFP No. 31
"@bitfinexed"	RFP No. 35, 48
"Authorized Tokens"	RFP No. 7
"bank account" w/5 (Tether or USDT)	RFP No. 31
"Bitcoin Management Solutions"	RFP No. 47
"Celsius Network" or Celsius w/5 (invest* or investment*)	RFP No. 69
"Crypto Capital" OR "Crypto SP. Z.O.O." or "Crypto SP ZOO" OR "Global Trading Solutions"	RFP Nos. 10, 27, 30
"don't have enough" w/5 (Tether OR USDT)	RFP No. 15
"End of month" or EOM	RFP Nos. 11, 12, 13, 14, 15
"Flash Crash"	RFP Nos. 11, 12, 18, 19, 56, 63
"Friedman LLP"	RFP No. 48
"Galaxy Benchmark"	RFP No. 36
"Galaxy Digital"	RFP No. 36
"Global trading"	RFP No. 27
"Jump Trading"	RFP No. 51
"Master Fund LP"	RFP No. 36
"Mega International"	RFP Nos. 3, 14, 31, 32
"Mt. Gox"	RFP No. 56
"Noble Markets"	RFP No. 40
"not 1:1"	RFP Nos. 7, 14, 15
"not enough" w/5 (tether or USDT)	RFP Nos. 7, 14, 15
"not tethered" OR un-tethered	RFP No. 54
"Paradise Papers"	RFP No. 52
"Potter Ventures"	RFP No. 47
"Quantifying the Effect of Tether"	RFP No. 53

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Search Term	Responsive RFPs (Plaintiffs)
"Shyft Network"	RFP No. 43
"Smart Property Solutions"	RFP No. 46
("Tether Authorizer" OR Tether) w/5 authorization	RFP Nos. 5, 7, 13
"Tether Report"	RFP No. 53
("USDT" w/5 (equal* OR equat*)) w/15 (USD OR dollar*)	RFP Nos. 7, 14, 15
"USDT/USD" w/5 "trading pair"	RFP Nos. 11, 12, 13,16, 17, 18, 19
("White paper" w/15 ("USDT" OR Tether OR token*)) w/15 (equat* OR back* OR equal* OR hold OR dollar* OR bank* OR account* OR fiat OR currenc* OR reserve* OR cash)	RFP Nos. 3, 5, 14, 31, 32
"Willy Report" OR "WillyBot"	RFP No. 56
"Bitcoin Really Un-Tethered"	RFP No. 54
"cat and mouse"	RFP 10, 12, 31, 47, 66,
"Crypto Capital"	RFP Nos. 10, 27, 30
"fully back*" and "fully-back*"	RFP Nos. 7, 14, 15
"Global Trade Solutions" or GTS*	RFP Nos. 27, 60
"not backed"	RFP Nos. 7, 14, 15
"price floor"	RFP Nos. 18, 19, 56
"private address*"	RFP Nos. 37, 63
"Smart Property Solutions" or SPS*	RFP No. 46
("Off exchange" OR "off-exchange" OR private OR "over-the-counter" or "over the counter" or "OTC") w/5 (transaction* OR arrangement* OR platform* OR exchange*)	RFP No. 24
("Treasury wallet*" OR "Tether treasury") w/15 Bitfinex w/15 (Tether OR "USDT")	RFP Nos. 72, 74
("1:1" OR "one to one") w/15 (Stablecoin OR "Stable coin" OR token OR "USDT" OR Tether)	RFP Nos. 7, 14, 15
("Know Your Customer" OR "know-your-customer" OR KYC OR "anti-money laundering" OR AML) w/15 (polic* OR procedur* OR complian* OR train OR Manual OR Notice)	RFP No. 66
((Account* OR maintain*) w/15 ("USDT" OR Tether)) w/15 (dollar* OR bank* OR account* OR fiat OR currenc* OR valu* ORreserve* OR balance OR "commercial paper*")	RFP Nos. 12, 14, 15

Search Term	Responsive RFPs (Plaintiffs)
(Account* OR Track* OR monitor* OR maintain*) w/15 ("USDT" OR Tether) w/15 (issu* OR redeem* OR redemption*)	RFP Nos. 12, 14, 15
(Agreement* OR contract*) w/25 (Bittrex OR Polo!)	RFP No. 60
Urriola OR (Ana w/2 Pan)	RFP No. 39
((Bolivar w/2 Jose) w/2 Gonzalez) OR (Bolivar w/2 Gonzalez)	RFP No. 39
(Bump* OR Crash* OR Drop* OR Jump* OR Spike* OR Floor) w/15 (price OR value OR Bitcoin OR BTC)	RFP No. 18, 19, 56, 63
(Burn* OR giv* OR destroy*) w/15 ("USDT" OR Tether OR token)	RFP Nos. 6, 11
(Data OR email) w/5 host* w/15 (polic* OR procedur* OR complian* OR train* OR Manual OR Notice)	RFP No. 68
(Document OR email) w/5 (retain or retention) w/15 (polic* OR procedur* OR complian* OR train* OR Manual)	RFP No. 77
(Investigat* OR inquir* OR Finding* OR report* OR case* OR audit*) w/15 ("New York AG" OR "New York Attorney General" OR "NY Attorney General" OR NYAG OR "NY AG" OR "Commodities Futures Trading Commission" OR CFTC OR (Dep* w/2 Justice) OR DOJ or "Exchange Commission" OR SEC	RFP Nos. 1, 2
(Guarant* OR promis* OR assur*) w/15 ("1:1" OR "one to one" OR "1-1" OR tethered OR redeem* OR exchang*)	RFP Nos. 7, 14, 15
(Hamid w/2 Reza) OR (Hamid w/2 Khoyi)	RFP No. 46
(Inflat* OR spik* OR manipulat* OR stabiliz* OR floor OR return* OR Solven* OR use*) w/15 (bitcoin OR demand OR market* OR customer* OR price* OR valu*)	RFP No. 18
(Ivan w/2 (Manuel OR Molina OR Lee)	RFP No. 39
(mov* OR manipulat*) w/10 (price OR Market)	RFP No. 18
(Print* OR issu* OR creat*) w/15 ("USDT" OR Tether OR token)	RFP Nos. 4, 5, 59, 61, 62
(Raise* OR request*) w/5 (prospectus* OR "private placement" OR PPM OR solicit* OR invest*)	RFP Nos. 70, 71
(Redeem* OR redempt*) w/10 ("USDT" or Tether OR token)	RFP No. 6
(Stablecoin OR "Stable coin" OR token OR "USDT" OR Tether) w/15 (equat* OR back* OR equal* OR hold*) w/25 (dollar* OR bank* OR account* OR fiat OR currenc* OR valu* OR reserve*)	RFP Nos. 16, 17, 18

Search Term	Responsive RFPs (Plaintiffs)
(support w/3 price) w/3 (bitcoin OR BTC)	RFP No. 63
((Tether OR Bitfinex OR Digfinex) w/15 ("Crypto Capital" OR "Global Trade Solutions")) w/25 reserve* OR operat* OR manag*)	RFP No. 27
(time OR Coordinat*) w/10 (mint* OR issu* OR Poloniex OR Bittrex OR Reggie OR Fowler)	RFP No. 63
((Track* OR monitor* OR maintain*) w/15 (polic* OR procedur* OR process* OR "manual process")) w/15 ("USDT" OR Tether OR reserv* OR account* OR issu* OR redeem* OR mint*)	RFP Nos. 12, 14, 15
(USDT OR Tether) w/5 address* w/15 (Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)	RFP No. 21
"@bitfinex_"	RFP No. 20, 35, 48
@brockpierce	RFP No. 50
1-to-1*	RFP Nos. 7, 14, 15
12cgpFdJViXbwHbhrA3TuW1EGnL25Zqc3P	RFP No. 28
13vHWR3iLsHeYwT42RnuKYNBoVPrKKZgRv	RFP No. 28
15ovrfyRTbhqeUkgAqAwtscXDASmietmcJ	RFP No. 28
16tg2RJuEPtZooy18Wxn2me2RhUdC94N7r	RFP No. 28
17A16QmavnUfCW11DAApiJxp7ARnxN5pGX	RFP No. 28
17sHnqeQcwvfPneJkmaTBAQEnQN82yi7ye	RFP No. 28
19-cv-09236*	RFP Nos. 16, 17, 18, 19
19-mc-00022*	RFP No. 3
1A6yDZj1241qtGzEeQWRaptxVEhzz5owLP	RFP No. 28
1A9AUhKv6aLrKGAdwMM9aHXECZM9uQivZK	RFP No. 28
1AA6	RFP No. 28
1AA6iP6hrZfYiacfzb3VS5JoyKeZZBEYRW	RFP No. 28
1AanEM2PU6GS7krwxaysKP3scwb3fdioyE	RFP No. 28
1CEZ4sjk7MUt3LSJi7bRvvbMZvGLWKCa1G	RFP No. 28
1Co1dhYDeF76DQyEyj4B5JdXF9J7TtfWWE	RFP No. 28
1DEcTtkrbdXxS1wbrMvzub5X4VpByYmAwo	RFP No. 28
1DUb2YYbQA1jjaNYzVXLZ7ZioEhLXtbUru	RFP No. 28
1F6nNgCTLcR4abWuMs1CHUWYNcnJ47tvbc	RFP No. 28
1Fdz3iQDDA6mJVoAV4ZcqgVFe1MX97EZoD	RFP No. 28
1G6jMfQotd6rV8VkMFNx4hPXYHioeBdquf	RFP No. 28
1GjgKbj69hDB7YPQF9KwPEy274jLzBKVLh	RFP No. 28

Search Term	Responsive RFPs (Plaintiffs)
1H48Bp7EGELgnGSVYKdiCuSo6n822mVmHg	RFP No. 28
1Hi1hyJpUeETGBTQ8aPZ69GBL8xBVV53XP	RFP No. 28
1J1d	RFP No. 28
1J1dCYzS5EerUuJCJ6iJYVPytCMVLXrgM9	RFP No. 28
1J8fgfPwn4dsxLiA5BnUkzHoubPJ6q5q8g	RFP No. 28
1KBXtTQnEgU34xXchwvmAoX7o5qZAp3xF	RFP No. 28
1Kr6QSydW9bFQG1mXiPNNu6WpJGmUa9i1g	RFP No. 28
1KYiKJEfdJtap9QX2v9BXJMpz2SfU4pgZw	RFP No. 28
1LJjvsEN9ZzeBVPB4XbhS7mxg99gBAPoMB	RFP No. 28
1LSgEKji3ZoGdvzBgkcJMej74iBd38fySb	RFP No. 28
1MZAayfFJ9Kki2csoYjFVRKHFFSkdoMLtX	RFP No. 28
1N52wHoVR79PMDishab2XmRHsbekCdGquK	RFP No. 28
1NTMakcgVwQpMdGxRQnFKyb3G1FAJysSfz	RFP No. 28
1NUyryQe1cQYmqg5bjwWNFXA8T1M6htSQ	RFP No. 28
1PCwER7f57fkPq2kuR9rYV7Wpr1LYvFWsA	RFP No. 28
1Po1oWkD2LmodfkBYiAktwh76vkF93LKnh	RFP No. 28
3BbDtxBSjgfTRxaBUgR2JACWRukLKtZdiQ	RFP No. 28
3D2oetdNuZUqQHPJmcMDDHYoqkyNVsFk9r	RFP No. 28
3MbYQMMmSkC3AgWkj9FMo5LsPTW1zBTwXL	RFP No. 28
agree w/15 (flow OR USDT OR Tether OR mint* OR issu* OR Poloniex OR Bittrex OR Reggie OR Fowler)	RFP Nos. 7, 11, 14, 15
Arbitrage	RFP No. 28
Artific* /15 (Bitcoin OR Bitcoin Cash OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Tether! OR USDT OR drop! OR crash!)	RFP Nos. 4, 5, 21, 59, 61, 62
Back w/5 (tether or USDT)	RFP Nos. 7, 11, 14, 15
[Name of "Anonymous Trader]	RFP No. 28
Betts	RFP Nos. 31, 40
(Bitfinex w/5 print*) w/5 Tether	RFP Nos. 4, 61, 62, 64
Bittrex	RFP Nos. 9, 61, 62, 63, 64, 65
Brock w/2 Pierce	RFP No. 50
Bubble w/15 (bitcoin OR market OR price)	RFP No. 63
call w/3 (me OR you)	RFP 18, 60

Search Term	Responsive RFPs (Plaintiffs)
Catastroph* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Tether* OR USDT OR drop* OR crash*)	RFP No. 21
(Chris w/2 Ellis) AND (Tweet or twitter OR warrant OR subpoena)	RFP No. 49
Conspir* w/10 (Tether* OR USDT)	RFP No. 60
Conspir* and (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)	RFP No. 21
Control* w/15 (pric* OR BTC OR bitcoin OR flow OR Demand OR Market)	RFP Nos. 21, 22, 23, 24, 25, 72, 74
Crash* w/10 (Tether* OR USDT)	RFP No. 63
Crash* /15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)	RFP No. 63
Crypto* w/15 future*	RFP Nos. 12, 17
CryptoCapital	RFP Nos. 10, 27, 30
D'Amico	RFP No. 31
Daniel w/2 Barrs	RFP No. 44
Debas* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)	RFP Nos. 21, 63
Debas* w/10 (Tether* OR USDT)	RFP Nos. 21, 63
Deceit* w/15 (executive* OR CEO OR director* OR CFO OR Velde OR Ardoino OR Devasini OR Warrack OR Bitfinex* OR Potter)	RFP No. 8
Declin* w/10 (Tether* OR USDT)	RFP Nos. 21, 63
Declin* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)	RFP Nos. 21, 63
Demand* w/10 (Tether* OR USDT)	RFP Nos. 21, 63
Demand* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR artificial or appearance)	RFP Nos. 21, 63
Disconnect* w/15 (Supply OR Demand)	RFP No. 18, 19, 56, 63
disrupt* w/10 (Tether* OR USDT)	RFP No. 18, 19, 56, 63
disrupt* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)	RFP Nos. 21, 63
Downturn* w/10 (Tether* OR USDT)	RFP Nos. 21, 63
Downturn* w/15 (Price OR Demand OR Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)	RFP Nos. 21, 63

Search Term	Responsive RFPs (Plaintiffs)
Drop* w/10 (Tether* OR USDT)	RFP Nos. 21, 63
Drop* /15 (Price OR Demand OR Bitcoin OR Bitcoin Cash OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)	RFP Nos. 21, 63
Epay* /15 (Bitcoin OR Bitcoin Cash OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Tether! OR USDT OR drop! OR crash!)	RFP Nos. 21, 63
Ethereum* AND USDT	RFP Nos. 21, 63
EURT*	RFP Nos. 21, 22, 23
Fals* w/15 (supply OR demand OR signal)	RFP No. 18, 19, 56, 63
Fangorn	RFP No. 47
Fowler*	RFP No. 10
Fraud* AND USDT	RFP Nos. 7, 11, 14, 15
Freeh w/2 Sporkin	RFP No. 57
Griffin	RFP No. 54
https://tether.to/en/tether-update	RFP Nos. 66, 67, 68
https://tether.to/en/transparency	RFP Nos. 66, 67, 68
https://tether.to/faqs/	RFP Nos. 66, 67, 68
Illegal* AND (trad* OR manipul* OR inflat*)	RFP Nos. 18, 63
Indict* AND (Tether* OR USDT)	RFP No. 1
Inflat* AND (Bitcoin OR ether OR crypto*)	RFP Nos. 7, 11, 14, 15
Insufficient w/5 (Tether OR USDT)	RFP Nos. 7, 11, 14, 15
Investigat!	RFP No. 1
IOU	RFP No. 7, 51
Loan AND USDT	RFP Nos. 37, 71
Loan* w/10 (token OR "USDT" OR Tether)	RFP Nos. 37, 71
Manipulat* AND (bitcoin OR ether*) AND USDT	RFP Nos. 18, 63
Mint* w/15 ("USDT" OR Tether OR token)	RFP Nos. 4, 5, 59, 61, 62
Misrepresent* /15 (asset* OR backing OR reserve OR liquid*)	RFP Nos. 11, 12, 14, 15, 32, 65
Monopol*	RFP No. 67
New w/5 (Tether OR USDT)	RFP Nos. 7, 11, 14, 15
One-for-one	RFP Nos. 7, 11, 14, 15
Org* w/5 (chart OR structure)	RFP No. 33
Oz w/2 Yosef	RFP No. 45

Search Term	Responsive RFPs (Plaintiffs)
Peg* w/5 (Tether OR USDT)	RFP Nos. 4, 5, 59, 61, 62
Pinchas w/2 (Goldshtein OR Goldstein)	No specific RFP
Poloniex	RFP Nos. 9, 61, 62, 63, 64, 65
Print w/3 money	RFP Nos. 4, 5, 59, 61, 62
print* w/5 (Tether or USDT)	RFP Nos. 4, 5, 59, 61, 62
prop* w/3 up*	RFP No. 63
Purchas* w/5 (Tether OR USDT)	RFP Nos. 4, 5, 59, 61, 62
Realcoin w/15 (equat* OR back* OR equal*) w/25 (dollar* OR bank* OR account* OR fiat OR currenc* OR reserve* OR cash)	RFP No. 7, 14, 31
Reggie OR Reginald OR Fowler	RFP No. 10
Releas* w/5 (Tether OR USDT)	RFP Nos. 4, 5, 59, 61, 62
Reserv* w/15 (cash or liquid or currency or sufficient or insufficient or paper or illiquid)	RFP Nos. 7, 11, 14, 15
Reserv* w/5 (Tether or USDT)	RFP Nos. 7, 11, 14, 15
(Spike* w/15 (demand or trad* OR price)) w/10 (Tether* OR USDT)	RFP No. 63
(Spike* w/15 (demand or trad* OR price)) w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Drop* OR Crash*)	RFP No. 63
Suspicious* w/10 (Tether* OR USDT)	RFP No. 63
Suspicious* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR spike or increase)	RFP No. 63
Tetherreport.com*	RFP No. 53
Trade* w/5 (Strategy OR Pattern)	RFP Nos. 4, 5, 59, 61, 62
Transfer* w/10 ("USDT" OR Tether OR token)	RFP Nos. 59, 63
Un-tether*	RFP No. 54
Unback*	RFP Nos. 7, 11, 14, 15
Undisclos* /15 (relationship or connection or tie* or arrangement)	RFP No. 60
Unfund*	RFP Nos. 7, 11, 14, 15
Untether*	RFP No. 54